

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

WINFORD DALLAS JONES,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 7:06-CV-00547
	)	
LORETTA M. D'SOUZA, Personal	)	
Representative of the ESTATE OF KRISTINA	)	
MAE ARCISZEWSKI, deceased, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**ROBINSON DEFENDANTS' MOTION TO DISMISS  
PURSUANT TO FED. R. CIV. PRO. 12(B) (6).**

COME NOW defendants C.H. Robinson Worldwide, Inc., C.H. Robinson Company, C.H. Robinson Company Inc., C.H. Robinson Company LP, C.H. Robinson International, Inc., C.H. Robinson Operating Company LP, and C.H. Robinson Transportation Company Inc. (collectively "the Robinson Defendants"), by counsel, and respectfully move this honorable Court to dismiss the Complaint for failure to state a claim upon which relief may be granted pursuant to Rule 12(b) (6), Federal Rules of Civil Procedure.

As support therefor, the Robinson Defendants refer to and incorporate herein by reference their Memorandum in Support of their Motion to Dismiss, which will be filed separately herein.

WHEREFORE, the Robinson Defendants ask that their motion be granted, that the case against them be dismissed, and that they be awarded costs, attorney's fees and such other relief as the Court may deem appropriate.

Respectfully submitted,

C.H. ROBINSON WORLDWIDE, INC.,  
C.H. ROBINSON COMPANY,  
C.H. ROBINSON COMPANY INC.,  
C.H. ROBINSON COMPANY LP,  
C.H. ROBINSON INTERNATIONAL,  
INC.,  
C.H. ROBINSON OPERATING  
COMPANY LP,  
and  
C.H. ROBINSON TRANSPORTATION  
COMPANY INC.,

By counsel,

\_\_\_\_\_/s/  
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Robert Michael Doherty (VSB #43997)  
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**Counsel for the Robinson Defendants**

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